



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GK/KCB/DL/SMF
F. #2018R01401

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 25, 2024

By Email and ECF

Jennifer Ann Bonjean
Bonjean Law Group, PLLC
303 Van Brunt Street
1st Floor
Brooklyn, NY 11231
(718) 875-1850

Imran H. Ansari, Esq.
Michael T. Jaccarino, Esq.
Arthur L. Aidala, Esq.
Aidala, Bertuna & Kamins PC
546 Fifth Avenue, Sixth Floor
New York, NY 10036
(212) 486-0011

Counsel for Nicole Daedone

Counsel for Rachel Cherwitz

Re: United States v. Rachel Cherwitz and Nicole Daedone
Criminal Docket No. 23-146 (DG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is being produced to you pursuant to the Protective Order in the above-captioned matter, entered on June 26, 2023, and signed by counsel on or about May 17, 2024 and September 9, 2024. ECF Dkt. No. 26. The following materials consist of documents and tangible objects:

- Satellite and street-view images of the following locations:
 - 28 Park St., Brooklyn, NY (ONETASTE00259487-ONETASTE00259488);
 - 47 Moss St., San Francisco, CA (ONETASTE00259489-ONETASTE00259490);
 - 55 Park Place, Brooklyn, NY ONETASTE00259491-ONETASTE00259492);
 - 61 Golden Aster Ct., Brisbane, CA (ONETASTE00259493-ONETASTE00259494);
 - 116 W 23rd St., New York, NY (ONETASTE00259495-ONETASTE00259496);

- 159 W 118th St., New York, NY (ONETASTE00259497-ONETASTE00259498);
- 206 Rustic Ave., Pittsburgh, PA (ONETASTE00259499-ONETASTE00259500);
- 306 Lamont Ave., San Antonio, TX (ONETASTE00259501-ONETASTE00259502);
- 406 Broadway, New York, NY (ONETASTE00259503-ONETASTE00259505);
- 431 Precita Ave., San Francisco, CA (ONETASTE00259506-ONETASTE00259507);
- 459 W 43rd St., New York, NY (ONETASTE00259508-ONETASTE00259509);
- 548 Market St., San Francisco, CA (ONETASTE00259510-ONETASTE00259512);
- 634 Westminster Ave., Venice CA (ONETASTE00259513-ONETASTE00259514);
- 714 Kensington Rd., Santa Monica, CA (ONETASTE00259515-ONETASTE00259516);
- 1072 Folsom St., San Francisco, CA (ONETASTE00259517-ONETASTE00259518);
- 1080 Folsom St., San Francisco, CA (ONETASTE00259519-ONETASTE00259520);
- 1275 4th St., Sacramento, CA (ONETASTE00259521-ONETASTE00259523);
- 1446 Market St., San Francisco, CA (ONETASTE00259524-ONETASTE00259525);
- 2525 Arapahoe Ave., Ste E4 #435, Boulder, CO (ONETASTE00259526-ONETASTE00259527);
- 3080 Valmont Rd., Boulder, CO (ONETASTE00259528-ONETASTE00259529);
- 3133 3rd Ave., San Diego, CA (ONETASTE00259530-ONETASTE00259531);

- 8501 Van Zandt Resort Rd., Philo, CA (ONETASTE00259532-ONETASTE00259539); and
- Salisbury House Finsbury Circus, London (ONETASTE00259540-ONETASTE00259541)
- Photographs of various individuals associated with OneTaste (ONETASTE0025942-ONETASTE00259628);
- Select photographs and videos on the Instagram account associated with the username @rachcherwitzpelletier as of September 18, 2024 (ONETASTE00259629-ONETASTE00259640);
- Communications and documents relating to OneTaste provided by Individual #5 (ONETASTE00259641-ONETASTE00259680);
- Materials produced by OneTaste in an ongoing civil proceeding (designated non-confidential) concerning publicity and the Frank Report (ONETASTE00259681-ONETASTE00259758);
- Articles published on Medium concerning OneTaste dated July 17, July 18, and July 19, 2023 and June 13, July 20, and August 6, 2024 (ONETASTE00259759-ONETASTE00259850);
- Communications and documents relating to OneTaste provided by Individual #17 (ONETASTE00259851-ONETASTE00259876);
- United States Internal Revenue Service Form 990 for Woman Inc. Foundation d/b/a Feminine Rising Foundation for the year 2018 (ONETASTE00259877-ONETASTE00259903);
- OM Residential Handbook, Guidelines to Living in an OM House (New York) (ONETASTE00259904-ONETASTE00259908); and
- Article entitled, “The Pleasure Principle,” published in the New York Times on March 15, 2009 (ProQuest) (ONETASTE00259909-ONETASTE00259914).

You may examine physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants’ obligations under Fed. R. Crim. P. 16(b) include identification of “all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant.” United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
Gillian Kassner
Kayla Bensing
Devon Lash
Sean Fern
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (DG) (by ECF) (without enclosures)